

# EXHIBIT C

UNITED STATES DISTRICT COURT  
DISTRICT OF VERMONT

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ESTATE OF WAYNE BRUNETTE, by       )  
BARBARA BRUNETTE, as personal       )  
representative and administratrix)  
of the ESTATE OF WAYNE BRUNETTE,) )  
and BARBARA BRUNETTE,                )  
individually,                         )  
                    Plaintiffs,        )  
                    vs.                         ) 215-cv-61  
CITY OF BURLINGTON, VERMONT;        )  
CITY OF BURLINGTON POLICE            )  
DEPARTMENT; CHIEF MICHAEL            )  
SCHIRLING, in his individual         )  
and official capacities, CPL.         )  
ETHAN THIBAULT, in his                )  
individual and official                )  
capacities; CPL. BRENT NAVARI,        )  
in his individual and official         )  
capacities,                             )  
                    Defendants.            )  
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DEPOSITION OF BARBARA DAVISON  
taken on September 12, 2016, at 10:58  
at the offices of Kirkpatrick &  
Goldsborough, South Burlington, Vermont.

APPEARANCES:

STEVEN A. ADLER, ESQ., of the firm of Adler &  
McCabe, St. Johnsbury, Vermont, on behalf of the  
plaintiffs;  
JENNIFER MCDONALD, ESQ., of the firm of Downs,  
Rachlin & Martin, Burlington, Vermont, on behalf  
of the defendants.

Reported by: Christina L. Boerner, RPR  
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1 Little, and Larry and Dolly. I'm not  
2 positive.

3 Q. Sonny Little?

4 A. Yes. Lives across the street. What  
5 do they call him?

6 Q. You call him Sonny?

7 A. Ray. Ray Little.

8 Q. Does he also go by "Sonny"?

9 A. Sonny is his nickname. It's what  
10 everybody calls him.

11 Q. Except the attorneys, apparently.

12 A. Yeah.

13 Q. So as far as the incident itself, and  
14 I don't want to dwell on it too much, because  
15 I think it's a difficult subject for you; so  
16 I think my only question is going to be, I  
17 will say that now, the primary question is,  
18 you weren't there at the time of the  
19 incident, correct?

20 A. Correct.

21 Q. So you don't have personal knowledge  
22 about what was said or what transpired during  
23 the incident --

24 A. First hand.

25 Q. -- first hand?

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1 A. Correct.

2 Q. So the information that you and that  
3 the estate has is based on what other  
4 witnesses have told you, correct?

5 A. Correct.

6 Q. Okay. Wayne had a history of being  
7 armed at the house, of saying that he wanted  
8 to be armed at the house, be it the pipe  
9 bombs; the guns; the baseball bat. Correct?

10 MR. ADLER: Objection.

11 A. No. The baseball bat was a baseball  
12 bat. The kids played softball. We played  
13 ball with the kids. Actually used it to play  
14 ball with the dogs all the time, in the back  
15 yard. It wasn't a weapon.

16 Q. Didn't -- in 2001 or 2003 he told  
17 doctors that he was always armed and ready to  
18 defend himself?

19 MR. ADLER: Objection.

20 A. Which is --

21 MR. ADLER: Go ahead.

22 A. Which is untrue. He had a gun for  
23 not very long before he was arrested. And he  
24 never had guns for many, many years. There  
25 was no weapons in our house.

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